



San Juan Water District

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February 8, 2006

Mr. Paul Marshall
1416 Ninth Street
Sacramento, Ca 95814

FEB 14 2006 00200

Subject: SDIP EIS/EIR Comments

Dear Mr. Marshall:

Thank you for the opportunity to comment on the South Delta Improvement Program (SDIP). I have provided my comments below as briefly as possible.

First, I would like to commend both the State of California (SWP) and the United States Bureau of Reclamation (CVP) in working in a collaborative approach to identify the most efficient way to manage water in the State of California. This cooperative approach is refreshing to witness.

The District supports full contractual deliveries to all CVP contractors. While encouraging the SWP and CVP to continue to work in a collaborative manner toward this goal, San Juan Water District believes that the projects must evaluate SDIP's potential impacts to water supply reliability at Folsom Reservoir. In the event that SDIP's implementation reduces carry over storage in Folsom Reservoir, the resulting impacts must be mitigated.

SDIP has significant potential to impact the reliability of water supplies provided by Folsom Reservoir for both consumptive and environmental uses. The CVP uses Folsom Reservoir as an "annual reservoir," based on the assumption is that the Reservoir is highly likely to refill each year, which it generally does. **The District, however, is seriously concerned about the years when Folsom Reservoir does not refill and about whether SDIP will make such shortages years more frequent and/or more severe. SDIP's impacts to fish flows and municipal water supply reliability could be significant if SDIP results in more frequent and/or more severe storage shortages at Folsom Reservoir.**

Folsom Reservoir supplies over 98% of the water supply for San Juan Water District (wholesale provider to Citrus Heights Water District, Fair Oaks Water District, Orange Vale Water Company, and San Juan Water District retail service

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area), as well as the cities of Folsom and Roseville. These purveyors are the water suppliers for the eastern portion of the greater Sacramento Metropolitan Area. The water supply at Folsom Reservoir is critical to the health and safety of over 250,000 people. **Folsom Reservoir is the only portion of the CVP capable of supplying this region.**

The SDIP EIS/EIR states that SDIP would reduce average carryover storage at Folsom Reservoir by an average of 22 taf because of the increased deliveries from the Reservoir to satisfy the increased export demands. It is not the average that primarily concerns the District, but rather the intermittent years in which Folsom storage could be reduced significantly. In those years when reduced Folsom carry over storage spikes significantly lower, water contractors south of the Delta should receive water provided from other reservoirs within the system. As the SWP and CVP continue to evaluate the operational criteria to utilize the additional capacity made available by the SDIP, it is imperative that any potential impact to the reliability of surface water deliveries to Sacramento-area CVP contractors be analyzed and mitigated in a suitable manner.

In addition, the SDIP EIS/EIR also must analyze, and propose mitigation for, the impacts that reduced Folsom storage may have on the lower American River's environmental resources. Sacramento-area municipal water purveyors like the District and environmental groups, among others, have signed the Sacramento Water Forum agreement, under which the signatories work together to satisfy the twin goals of enhancing the region's water supplies and improving the lower American River's environmental resources. Folsom Reservoir of course provides flows to the lower American River. If SDIP would result more frequent and/or more significant reductions in lower American River flows during dry years, then that impact must be analyzed and mitigated in a suitable manner.

I appreciate your acceptance of my comments. If you have any additional questions or comments, please do not hesitate to contact me on my direct line at 916-791-6936.

Sincerely,

A handwritten signature in cursive script that reads "Shauna Lorance".

Shauna Lorance
General Manager